



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

AUG - 6 2014

OFFICE OF  
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-084

**CERTIFIED MAIL -- RETURN RECEIPT REQUESTED**

EPA WARNING LETTER

Mr. Michael Moody  
Senior Plant Engineer  
Amy's Kitchen, Inc.  
441 West Antelope Road  
White City, Oregon 97503

Re: Risk Management Program Compliance Inspection  
Amy's Kitchen, Inc.  
EPA Facility ID# 1000 0019 7137

Dear Mr. Moody:

On April 23, 2014 the U.S. Environmental Protection Agency (EPA) conducted an inspection of the Amy's Kitchen, Inc. facility located at 441 West Antelope Road, White City, Oregon. The Purpose of the inspection was to evaluate compliance with Section 112(r) of the Clean Air Act also known as the Risk Management Program (RMP). The RMP inspection was conducted pursuant to the authorities under Section 112(r) and Section 114 of the Clean Air Act. Listed below are the areas of concern identified by EPA:

The process hazard analysis (PHA) was not updated and revalidated by a team every five years after the completion of the initial PHA to assure that the PHA is consistent with the current process as required in 40 C.F.R. § 68.67(f). The initial PHA was completed in 2006, and was revalidated in 2012, more than five years after the initial PHA.

Please refer to the document *General Risk Management Program Guidance* for additional information pertaining to the areas of concern addressed above. This guidance document can be found on EPA's website at: [http://www.epa.gov/emergencies/content/rmp/rmp\\_guidance.htm#General](http://www.epa.gov/emergencies/content/rmp/rmp_guidance.htm#General)

We urge you to take the steps necessary to address these concerns and to ensure that all aspects of your operation are conducted in accordance with all applicable federal, state, and local requirements. If in the future, additional violations are identified and/or corrections to the identified concerns are not made, EPA may proceed with enforcement action. If you have any questions about the inspection or the Risk Management Program, please contact Javier Morales, RMP Coordinator, at (206) 553-1255 or [morales.javier@epa.gov](mailto:morales.javier@epa.gov).

Sincerely,

Kelly McFadden, Manager  
Pesticides and Toxics Unit